

# **Formal Position Statement on the Draft National Standards for Counsellors and Psychotherapists**

**Issued by the Vocational Mental Health Practitioners Association of Australia (VMHPAA)**

Date: 11 June 2025

## **Executive Summary**

VMHPAA strongly opposes the exclusion of diploma-qualified counsellors from private practice, on the grounds that such a measure is not evidence-based, risks diminishing public access to mental health services, and has been proposed without adequate sector-wide consultation. If implemented, the draft standards will unnecessarily disenfranchise thousands of competent practitioners, especially in rural and underserved areas, creating harmful gaps in care.

### **Comparison of Consultation Data vs VMHPAA Petition:**

- Consultation received only 340 submissions total, with just over 200 from individuals.
- VMHPAA collected over 700 petition signatures in under one week from vocationally qualified counsellors.
- Many vocational counsellors reported not being informed of the consultation process.
- VMHPAA filled a critical representational void left by traditional peak bodies.

### **Impact on Regional and Underserved Communities:**

Many diploma-qualified counsellors are delivering essential services in rural, regional, and low-access communities. Excluding these practitioners from the workforce will reduce timely access to mental health support in these areas and increase pressure on already overstretched tertiary-qualified professionals. This directly contradicts national goals of improving access and continuity of care across all Australian communities.

### **Alignment with National Strategy:**

This position aligns with key national frameworks, including the National Mental Health Workforce Strategy and the Fifth National Mental Health and Suicide Prevention Plan, both of which emphasise the need for a skilled, sustainable, and diverse mental health workforce. Recognising vocationally qualified counsellors is essential to achieving these outcomes.

### **Call to Action:**

VMHPAA respectfully requests formal inclusion as a recognised stakeholder in the finalisation of the National Standards for Counsellors and Psychotherapists. It is essential that vocationally trained practitioners are given a voice in shaping policy that directly affects their practice and the wellbeing of the communities they serve.

## From the Chair

The Vocational Mental Health Practitioners Association of Australia (VMHPAA) welcomes the opportunity to provide this Chair's Statement in support of our formal response to the Draft National Standards for Counsellors and Psychotherapists (November 2024), published 7<sup>th</sup> June 2025. As Chair, I am proud to speak on behalf of two primary constituencies that VMHPAA exists to represent:

1. **The Australian Community** – To whom we are committed through the delivery of accessible, ethical, and high-quality mental health services. We advocate for their right to receive care from competent professionals across the spectrum of the mental health workforce, including vocationally trained practitioners.
2. **Vocationally Trained Mental Health Practitioners** – Our members come from diverse professional backgrounds and training pathways. Within this submission, our voice specifically advocates for **vocationally trained counsellors**, whose contributions are central to mental health care provision across community, disability, aged care, education, and private sectors.

We write not in opposition to our colleagues or to discredit other professional bodies, but to raise urgent concerns about aspects of the Draft National Standards that, if enacted unchanged, would unjustly exclude a vital tier of the counselling workforce. These concerns are not new, nor are they reactionary. They are the result of decades of service delivery, direct community feedback, peer-reviewed research, and careful reflection on the evolving needs of both clients and practitioners.

As Chair, I affirm our support for national standards that uplift the integrity and professionalism of our sector. However, we cannot support elements of the current draft that threaten to exclude a vital workforce based not on evidence of harm, but on an ideology that privileges academic pathways over proven, safe, and community-based practice.

In this statement, we outline:

- The legal, clinical, and equity-based risks associated with the current draft;
- The absence of appropriate consultation with vocational representatives;
- The serious consequences of excluding a substantial portion of the current workforce; and
- Practical recommendations for inclusive, evidence-informed revisions.

We acknowledge there is debate within the sector, and while others have chosen to publicly criticise our position, we remain focused on what matters most: protecting the diversity and capacity of the mental health workforce to meet the needs of all Australians. This is not a binary contest of qualification prestige, it is a shared responsibility to get this right.

To be clear:

- **We do not argue for equivalence** between vocational and higher education qualifications;
- **We do advocate for fair, clearly defined scopes of practice** for all counsellors, recognising the competencies, training, and lived realities of vocational professionals;

- And **we reject any blanket exclusion** of vocationally qualified counsellors from private practice and supervision roles, particularly in the absence of legal or clinical justification.

The VMHPAA asserts that removing vocationally trained counsellors from private practice and supervision roles would create an immediate and substantial service gap. At a time when demand for mental health support is rising sharply, particularly in the wake of national crises and increasing rates of psychological distress, this reduction in workforce capacity is not only irresponsible, it is dangerous.

Many regional, rural, and remote areas in Australia depend almost exclusively on vocationally trained practitioners (AQF Level 5 or below) for clinical mental health care. These professionals are not just filling the gaps, they are the frontline. To arbitrarily remove their scope of practice is to risk abandoning whole communities who already struggle to access timely, culturally competent support.

We remain ready and willing to work collaboratively with all stakeholders in the development of standards that are fair, effective, and future-ready.

To be clear for the VMHPAA this is not a debate about status. It is a call for evidence-based policy, respectful recognition of frontline experience, and collaborative standard-setting that protects both practitioners and the communities they serve.

We stand firm in our message: quality mental health care in Australia must be inclusive, accessible, and built upon the diverse strengths of its workforce.



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# Summary of Key Objections and Recommendations

The VMHPAA raises the following critical concerns regarding the Draft National Standards for Counsellors and Psychotherapists:

## 1. Exclusion of Diploma-Qualified Practitioners

- The draft proposes to bar AQF Level 5-qualified counsellors from private practice and clinical supervision roles.
- This risks disenfranchising a significant portion of the workforce with no evidence of harm, clinical risk, or public complaints to justify such a move.
- These exclusions will disproportionately impact rural, regional, and community-based services that depend on vocationally trained professionals.

## 2. Legal and Regulatory Risks

- The proposed restrictions may breach principles of fair access and competition:
  - **Unlawful restraint of trade**, as no legislation exists that mandates such exclusions.
  - **Potential indirect discrimination**, particularly against neurodivergent, mature-aged, and female practitioners.
  - No apparent **Regulatory Impact Statement (RIS)** or legal risk analysis has been conducted.

## 3. Lack of Evidence-Based Justification

- Peer-reviewed research confirms:
  - Clinical outcomes are more strongly predicted by **therapeutic alliance** and practitioner empathy than by academic qualification.
  - There is **no correlation** between higher degrees and increased safety or effectiveness in counselling practice.

## 4. Inconsistent Standards Across Mental Health Workforce

- The proposed standards create a double standard by:
  - Allowing peer support workers ( Cert IV) and mental health workers (Diploma) to operate in sensitive roles.
  - Holding vocational counsellors to higher thresholds than other comparable mental health professionals.

## 5. Exclusion from Consultation

- VMHPAA, despite its broad representation of vocationally trained practitioners, was **not included** in formal consultation processes.
- This raises serious concerns about **procedural fairness** and transparency in the development of national policy.

## 6. Risk to Workforce Diversity and Community Access

- 71% of diploma-qualified counsellors are women, most aged 45–54.
- Exclusion will eliminate career pathways for many and reduce access in high-need, underserved areas.
- Such a change risks further straining an already overstretched national mental health system.

## 7. Overlooking ASQA’s Role and Existing Regulation

- The **Australian Skills Quality Authority (ASQA)** already regulates the Diploma of Counselling, ensuring quality, ethical training through audits and national compliance.
- Dismissing this credential without legal or clinical basis undermines public trust in the vocational education system.

## VMHPAA Recommendations

In light of the concerns outlined above, the VMHPAA makes the following recommendations:

1. **Amend Specific Focus Areas** – Revise Focus Areas 1.3.1, 1.3.2, and 2.1.7 to explicitly acknowledge and support the legitimate role of AQF Level 5-qualified counsellors in both private practice and supervisory capacities.
2. **Commission a Regulatory Impact Statement (RIS)** – Undertake a comprehensive legal and economic assessment of the potential consequences of excluding vocationally trained professionals from practice.
3. **Include Vocational Stakeholders in Consultation** – Ensure that VMHPAA and representatives from the VET sector are directly engaged in all future standard-setting discussions.
4. **Recognise Safe Historical Practice** – Acknowledge the long-standing contribution of vocationally trained counsellors, whose ethical and safe work has been integral to national service delivery for over two decades.
5. **Delay Implementation** – Postpone any restrictive measures until further, inclusive review is undertaken with balanced stakeholder input.
6. **Maintain Pathways to Practice** – Ensure clear and accessible professional progression frameworks that recognise the diversity of training routes and learning models.
7. **Promote a Tiered Workforce Model** – Support an ecosystem of practice that accommodates diverse qualification levels, ensuring mental health care is both accessible and effective across urban, regional, and remote areas.
8. **Public Safety Not Strengthened by Proposed Exclusions** - There is no evidence that excluding diploma-qualified practitioners will enhance public safety. In fact, reducing workforce capacity, particularly in regional and underserved areas, may increase risk by limiting timely access to care. Safe practice is supported by robust supervision and ethical oversight, not exclusively by qualification level.
9. **Inadequate Sector Representation in the Consultation Process** - The consultation process recorded a total of 340 submissions - just over 200 from individuals - despite an estimated 50,000 counsellors in Australia. In contrast, VMHPAA gathered in excess of 700 petition signatures from vocationally trained professionals in under one week, reflecting significant unrepresented concern. This disparity calls into question the representativeness and equity of the consultation process and warrants further engagement before finalising standards.